

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:18CR00215 AGF
)	
SHANNON RENNEE BRADLEY,)	
)	
Defendant.)	

**GOVERNMENT'S NOTICE OF INTENT TO INTRODUCE EVIDENCE
PURSUANT TO FEDERAL RULE OF EVIDENCE 404(b)**

COMES NOW the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and James C. Delworth and Sara E. Koppenaal, Assistant United States Attorneys for said District, and pursuant to FRE Rule 404(b), hereby respectfully advises the Court and the defendant in the above-styled cause of its intention to introduce the following evidence of other crimes against said defendant for the purpose of proving intent, knowledge and common scheme or plan:

Testimony of Witness(es) regarding Defendant's Prior Arrest

On May 23, 2017, the defendant was arrested for possession of heroin, a controlled substance, in St. Louis County, Missouri, and was subsequently charged for said offense in the Circuit Court of St. Louis County in Case Number 17SL-CR08816, which is still pending.

The Government anticipates that during trial one or more witnesses will testify to the facts surrounding the defendant's arrest.

The Government previously provided to defense counsel the copies of the police and lab reports on January 9, 2020. Attached to this Notice is the Complaint and Probable Cause Affidavit filed by the St. Louis County Prosecuting Attorney's Office in Case Number 17SL-CR08816.

Purpose of Testimony

Insofar as this evidence may be considered uncharged conduct, the Government offers it for the limited purpose of proving defendant's knowing and intentional participation in the drug conspiracy and distribution charges, which is also part of a common plan or scheme. Defendant has put into issue her knowledge of any heroin and/or fentanyl, her intent to distribute heroin and/or fentanyl and her common plan with co-defendant Brewer to distribute heroin and/or fentanyl. During a post-arrest statement, the defendant claimed not to remember the events involving the distribution of heroin to the victim on October 21, 2017, claimed that she merely possessed Dormin and not heroin or fentanyl when arrested on October 25, 2017 and implied that she was putting Dormin into capsules to sell. It is the government's contention that the defendant distributed and conspired to distribute capsules containing heroin/fentanyl to support both her and co-defendant Brewer's heroin/fentanyl habits.

The Government will submit a proposed limiting instruction to be read before this evidence is presented to inform the jury of the purposes for which evidence of uncharged conduct can be considered.

The Government respectfully requests a pre-trial ruling on the admissibility of this evidence.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ James C. Delworth
JAMES C. DELWORTH, 29702MO
SARA E. KOPPENAL, #66605MO
Assistant United States Attorneys
111 S. 10th Street, Room 20.333
St. Louis, Missouri 63102
(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

William S. Margulis
Attorney at Law
(Attorney for defendant Bradley).

/s/ James C. Delworth
JAMES C. DELWORTH, 29702MO
SARA E. KOPPENAAL, #66605MO
Assistant United States Attorneys